

**From:** [Valerie Bateman](#)  
**To:** [Tammey Burroughs](#); [Katie Hartzog](#)  
**Cc:** [norwood@cmclawfirm.com](mailto:norwood@cmclawfirm.com)  
**Subject:** RPD Responses for Patricia Uzzell, Gene Taylor, and Teresa Whitehead  
**Date:** Wednesday, March 16, 2022 8:51:44 PM  
**Attachments:** [image00001.png](#)  
[image00002.png](#)  
[image00003.png](#)  
[Taylor's Resp to RPD \(Town\) 2022.03.16.pdf](#)  
[Uzzell Resp to RPD \(Town\) 2022;03.16.pdf](#)  
[Whitehead's Resp to RPD \(Town\) 2022.03.16.pdf](#)

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Valerie Bateman has shared OneDrive for Business files with you. To view them, click the links below.

-  [Taylor's Resp to RPD \(Town\) 2022.03.16.pdf](#)
  -  [Uzzell Resp to RPD \(Town\) 2022;03.16.pdf](#)
  -  [Whitehead's Resp to RPD \(Town\) 2022.03.16.pdf](#)
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<!--[endif]-->

Please see the attached pdfs. I have two audio recordings I am going to figure out how to send to you tomorrow.

Valerie L. Bateman  
**NEW SOUTH LAW FIRM**  
209 Lloyd Street, Ste 350  
Carrboro, NC 27510  
919.810.3139

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**From:** [Valerie Bateman](#)  
**To:** [Tammey Burroughs](#)  
**Cc:** [Katie Hartzog](#)  
**Subject:** RE: Interrogatory Responses  
**Date:** Wednesday, March 16, 2022 4:20:38 PM  
**Attachments:** [image001.png](#)  
[image00001.png](#)  
[image00002.png](#)  
[Uzzell Resp to Int \(Town\) 2022.03.16.pdf](#)  
[Taylor's Resp to Int \(Town\) 2022.03.16.pdf](#)

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 [Uzzell Resp to Int \(Town\) 2022.03.16.pdf](#)

 [Taylor's Resp to Int \(Town\) 2022.03.16.pdf](#)

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See the attached for Patricia Uzzell and Gene Taylor. I should have the interrogatory responses for Teresa Whitehead and Melissa Hayman later today. I'm still waiting on the verifications, which I hope to have back later this week or next week. I'll send the document request responses in a separate email.

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**From:** Tammey Burroughs <[tburroughs@hartzoglawgroup.com](mailto:tburroughs@hartzoglawgroup.com)>  
**Sent:** Wednesday, March 16, 2022 3:04 PM  
**To:** Valerie Bateman <[valerie@newsouthlawfirm.com](mailto:valerie@newsouthlawfirm.com)>  
**Cc:** Katie Hartzog <[khartzog@hartzoglawgroup.com](mailto:khartzog@hartzoglawgroup.com)>  
**Subject:** RE: Discovery Responses

Hi Valerie,

We still are not in receipt of your clients' responses to the Town's interrogatories and requests for production. If we do not receive complete responses by April 1, 2022, we will file a motion to compel. Please submit all outstanding discovery as soon as possible.

Thanks and best regards,

Tammey Burroughs



2626 Glenwood Ave., Ste. 305  
Raleigh, NC 27608  
Office/Fax: 919-249-7381  
[tburroughs@hartzoglawgroup.com](mailto:tburroughs@hartzoglawgroup.com)  
[www.hartzoglawgroup.com](http://www.hartzoglawgroup.com)

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**From:** Valerie Bateman <[valerie@newsouthlawfirm.com](mailto:valerie@newsouthlawfirm.com)>

**Sent:** Monday, February 28, 2022 11:57 PM

**To:** Katie Hartzog <[khartzog@hartzoglawgroup.com](mailto:khartzog@hartzoglawgroup.com)>; Tammey Burroughs  
<[tburroughs@hartzoglawgroup.com](mailto:tburroughs@hartzoglawgroup.com)>

**Subject:** RE: Discovery Responses

I still don't have those verifications back, but hope to send the verified interrogatory responses along with the RPD responses tomorrow. Again, as always, thanks for your patience. See attached RFA responses.

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**From:** Valerie Bateman

**Sent:** Monday, February 28, 2022 11:52 AM

**To:** Katie Hartzog <[khartzog@hartzoglawgroup.com](mailto:khartzog@hartzoglawgroup.com)>; Tammey Burroughs  
<[tburroughs@hartzoglawgroup.com](mailto:tburroughs@hartzoglawgroup.com)>

**Subject:** Discovery Responses

Katie and Tammey, Just wanted to let you know that I should have these to you today, although the verifications will follow. Thanks for your patience; it is very much appreciated. Valerie

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**From:** [Valerie Bateman](#)  
**To:** [Tammey Burroughs](#)  
**Cc:** [Katie Hartzog](#)  
**Subject:** RE: Discovery Responses - Teresa Whitehead  
**Date:** Wednesday, March 16, 2022 8:44:28 PM  
**Attachments:** [image001.png](#)  
[image00001.png](#)  
[image00002.png](#)  
[Whitehead Resp to Int \(Town\) 2022.03.16.pdf](#)  
[Whitehead's Resp to RPD \(Town\) 2022.03.16.pdf](#)

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 [Whitehead's Resp to RPD \(Town\) 2022.03.16.pdf](#)

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See attached. Again, I should have the verification for the interrogatories later this week or early next week.

Thank you very much for your patience.

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